

# EXHIBIT 304

THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS,

No. 22-cv-10904-JSR

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

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JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,  
Third-Party Defendant.

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THE ORAL DEPOSITION OF JEAN-PIERRE ORIOLE was  
taken on the 16th day of June, 2023 at the Ritz-Carlton  
Hotel, 6900 Great Bay, Nazareth, Charlotte Amalie, St.  
Thomas, U.S. Virgin Islands, between the hours of 9:13  
a.m. and 4:02 p.m. pursuant to Notice and Federal Rules of  
Civil Procedure.

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Reported by:  
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**JEAN-PIERRE -- CROSS**

1 A. Yesterday.

2 Q. And who was that meeting with?

3 A. It was with you and with Attorney McKenny.

4 Q. Okay, thank you.

5 Commissioner Oriol, I want to start  
6 with the last document that counsel showed you,  
7 which is Exhibit 38. Let me know when you have that  
8 document in front of you.

9 A. I have it.

10 Q. Okay. I want to ask you about a couple of  
11 provisions in this article that counsel did not ask  
12 you about.

13 And so, first, let's start with, on  
14 the second page, there is a reference to your name.  
15 It's maybe two-thirds of the way down. The  
16 paragraph that starts, "Current DPNR Commissioner,  
17 Jean-Pierre Oriol."

18 Do you see that?

19 A. Yes.

20 Q. Okay. So the second sentence in -- first  
21 of all, the first sentence said -- the first  
22 sentence reads, "Current DPNR Commissioner,  
23 Jean-Pierre Oriol, who has been with the department  
24 since 2000, has said Epstein never received special  
25 treatment."

**JEAN-PIERRE -- CROSS**

1 Do you see that sentence?

2 A. Yes.

3 Q. Is that sentence correct?

4 A. Yes.

5 Q. Is that sentence an accurate depiction of  
6 your opinion as to whether Mr. Epstein ever received  
7 special treatment?

8 A. Yes.

9 Q. And why do you say that?

10 A. Because I think that going through all of  
11 these documents here today, it proves that we were  
12 trying to, A, enforce the provisions that were  
13 insisting, and as things progressively mounted, we  
14 sought stiffer regulatory things against the  
15 development that was going on there. So I think we  
16 were being consistent with the law.

17 Q. Thank you. The next sentence says, "But  
18 like Henry, he said the department didn't have  
19 adequate manpower or vessels to monitor Epstein's  
20 islands, and whatever enforcement penalties were  
21 levied had little effect."

22 Did I read that correctly?

23 A. Yes.

24 Q. And do you believe that sentence is true?

25 A. Yes.

**JEAN-PIERRE -- CROSS**

1 Q. (By Mr. Ackerman:) So, when you say that  
2 in a given year, after 2011, are you saying that it  
3 would be 60 new applications plus roughly 60 active  
4 applications that would require monitoring?

5 A. Yes.

6 Q. Okay. The DPNR's jurisdiction, how is  
7 that defined?

8 A. So, I mean, everything -- DPNR and our  
9 mission and what we're there to do in our totality  
10 is set out by Virgin Islands Code. It's Title 3, I  
11 think it's Chapter 22. And so it talks about the  
12 protection of clean air, clean water, fish, wildlife  
13 for zoning. So protection of endangered species.

14 So, we are -- we are the local agency  
15 that you would equate to the things that are covered  
16 in the National Environmental Policy Act.

17 So, all of the clean air, clean water  
18 regulations, that govern the United States, we're  
19 the local enforcement arm agency.

20 Q. Okay. Are you familiar with those code  
21 provisions?

22 A. Yes.

23 Q. And does the DPNR or DPNR employees have  
24 ability or authority to act outside of the code  
25 provisions?

**JEAN-PIERRE -- CROSS**

1 process any permits, any future permits going on.  
2 You know, he did not direct Commissioner Henry to  
3 take a different approach. He didn't direct me to  
4 take a different approach. You know, he stated that  
5 the -- you know, let's resolve the matter. But, you  
6 know, he did not stand down or force anybody to take  
7 away the Notice of Violation that was issued.

8 And, you know, the other part is,  
9 I -- as the director of CZM, I served at the  
10 pleasure of the governor and I ended up keeping my  
11 job. So --

12 Q. Thank you.

13 You were shown a number of documents  
14 today that were authored by or sent to Cecile de  
15 Jongh?

16 A. Cecile, yeah.

17 Q. Cecile de Jongh. Thank you.

18 And there were some questions  
19 early -- earlier in the morning about Cecile de  
20 Jongh's association or marriage, frankly, to the  
21 governor. Do you recall that?

22 A. Yes.

23 Q. There have been allegations in this case  
24 that Mr. Epstein paid the tuition for the de Jongh  
25 children to attend school, their school tuition.

**JEAN-PIERRE -- CROSS**

1 A. Okay.

2 Q. Are you aware of those allegations?

3 A. No. I mean, as allegations? No.

4 Q. How long have you lived on -- or in the  
5 Virgin Islands?

6 A. All my life.

7 Q. Without asking you how old you are, about  
8 how many years is that?

9 A. Forty-six years, minus the four years I  
10 went to college. But I still lived here.

11 Q. In your experience, is it unusual for  
12 companies in the Virgin Islands to pay the tuition  
13 cost for their employees?

14 A. No.

15 Q. Explain that, please.

16 A. So, I mean, we have a -- what is it? We  
17 have an EDA, or an Economic Development Authority  
18 Program which entices companies that, you know, that  
19 do business here or not, sometimes not even within  
20 the Virgin Islands.

21 And some of those companies, some of  
22 my friends have worked for those companies, like,  
23 the International Capital Management, ICMC. And,  
24 you know, some of them, their tuitions get paid by  
25 the company. When Hovensa, the refinery in

**JEAN-PIERRE -- CROSS**

1 St. Croix was open, they paid for employees' kids to  
2 go to the Good Hope School, or Country Day School in  
3 St. Croix.

4 Even right now our semiautonomous  
5 agencies, such as the Water and Power Authority, the  
6 hospitals, they give -- pay tuition bonus to the  
7 executive directors to pay for school. So, it's not  
8 uncommon or unusual for a company to pay for tuition  
9 to a student.

10 Q. Thank you. Would you pull Exhibit 31,  
11 please?

12 THE WITNESS: 31.

13 MR. NEIMAN: What's the date on the back  
14 here?

15 MR. ACKERMAN: This is, it's JPM84470,  
16 it's a May 20, 2019 email.

17 Q. (By Mr. Ackerman:) Okay. So do you have  
18 that in front of you?

19 A. Yes.

20 MR. NEIMAN: Just give me a second so I  
21 find it.

22 MR. ACKERMAN: Sure.

23 MR. NEIMAN: This is -- yeah, I got it.

24 MR. ACKERMAN: This is the EPA.

25 MR. NEIMAN: Yep.